

UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF DELAWARE

In re:

Team Systems International, LLC,

Debtor(s).

Chapter 11

Case No. 22-10066-CTG

**DECLARATION OF GEORGE PETERSON IN SUPPORT OF GPDEV, LLC  
AND SIMONS EXPLORATION, INC.'S RESPONSE TO THE DEBTORS CASH  
MANAGEMENT MOTION**

George Peterson declares as follows:

1. I am a member of GPDEV, LLC, a California limited liability company.
2. I am above the age of majority and competent to testify on behalf of GPDEV, LLC.
3. As a member of GPDEV, LLC, I am familiar with its business and financial affairs, and am authorized to make this declaration.
4. I submit this declaration in support of GPDEV, LLC and Simons Exploration, Inc.'s, Response (D.I. 12) in Opposition to the Debtor's Motion seeking interim and final orders (i) authorizing the maintenance of its bank account at Artisan's Bank and continued use of its business forms; (ii) authorizing the continued use of its cash management system; and (iii) providing any additional relief required in order to effectuate the foregoing (the "**Cash Management Motion**").
5. The Cash Management Motion also seeks for it to be able to, in its discretion, (i) pay any Bank Account related fees, and (ii) close or otherwise modify the terms of the Bank Account and open new debtor in possession accounts.

6. The Debtor owes GPDEV, LLC \$3,297,995.32 plus continually accruing post-judgment interest as a result of a Final Judgment entered by the United States District Court for the Northern District of Florida on September 28, 2021 (the “**GPDEV Final Judgment**”).

7. The GPDEV Final Judgment arose because the Debtor, Team Systems International, LLC (“**TSI**”) failed to pay GPDEV, LLC and SIMMONS twenty five percent (25%) of the net income TSI received from the sale of bottled water to FEMA after Hurricane Maria.

8. At trial, the Jury determined that TSI had in excess of \$25,000,000 in net income.

9. By its own admission, TSI has no ability to bid on any government contracts due to the Final Judgments it owes to GPDEV, LLC and Simons Exploration, Inc. Declaration of Debora Evans Mott in Support of Debtor’s Chapter 11 Petition and First Day Motion (D.I. 3) at ¶ 15.

10. By its own admission, TSI has no employees or other creditors. Id. at ¶¶ 19 and 20.

11. TSI was ordered on multiple occasions to produce information to GPDEV, LLC in post-judgment discovery in aid of execution, but produced not one single item.

12. TSI was denied a stay of execution by both the District Court and the Eleventh Circuit Court of Appeals.

13. TSI then filed this case as an emergency filing, in bad faith as a litigation tactic to attempt to avoid a Show Cause hearing in which Deborah Evans Mott was ordered to appear and to provide her contact information and location so that the United

States Marshalls Service could take her into custody until the post-judgment discovery requests and information were produced to GPDEV, LLC and Simons Exploration, Inc.

14. I have reviewed the Response (D.E. 12) and verify that each of the factual averments therein are true and correct.

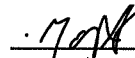
15. Further, upon information and belief, TSI swept its bank accounts at PNC Bank in order to avoid garnishments, and only recently created the account it seeks authority to access at Artisans' Bank.

16. The Court should not permit TSI to access its cash or utilize its undefined "cash management system".

17. GPDEV, LLC and Simons Exploration, Inc. are also in the process of preparing a Motion to Dismiss this case for bad faith, which will be finalized and filed as soon as practicable.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on January 24, 2022

  
\_\_\_\_\_  
george peterson (Jan 24, 2022 09:55 PST)

George Peterson on behalf of GPDEV, LLC






# Declaration of George Peterson

Final Audit Report

2022-01-24

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